

IN THE CIRCUIT COURT OF THE 15<sup>th</sup>  
JUDICIAL CIRCUIT IN AND FOR PALM  
BEACH COUNTY, FLORIDA

CASE NO.: 502015CA002369XXXXMB

EDMUNDO PEREZ, as Personal Representative of the  
Estate of ASHLEY PEREZ, Deceased, on behalf of the  
Estate of ASHLEY PEREZ and the lawful survivors of the  
Decedent, To Wit: AMALIA PEREZ, as surviving  
daughter, and DYLAN PEREZ, as minor surviving son,

Plaintiff,

vs.

WELLINGTON REGIONAL MEDICAL CENTER,  
INC., individually and on behalf of its agents, apparent  
agents, servants and employees; JAMES JUSTIN GOAD,  
M.D.; PALM BEACH GENERAL SURGERY d/b/a  
THE CENTER FOR ADVANCED SURGICAL CARE;  
ST. MARY'S MEDICAL CENTER, INC., d/b/a ST.  
MARY'S MEDICAL CENTER; WILLIAM JEFFREY  
DAVIS, D.O.; PALM BEACH TRAUMA  
ASSOCIATES, individually and on behalf of its agents,  
apparent agents, servants and employees; ROBERT  
BORREGO, M.D., P.A., independently and as general  
partner of PALM BEACH TRAUMA ASSOCIATES;  
AHMED EL-HADDAD, M.D., P.A.; DIMITER B.  
HRISTOV, M.D., P.A., independently and as general  
partner of PALM BEACH TRAUMA ASSOCIATES;  
RAYMOND HENDERSON, SR., M.D.; RAYMOND  
HENDERSON, SR., M.D., P.A,

Defendants.

**DEFENDANTS, AHMED EL-HADDAD, M.D., and DIMITER HRISTOV, M.D.'s,**  
**EXPERT WITNESS DISCLOSURE**

The Defendants, AHMED EL-HADDAD, M.D., and DIMITER HRISTOV, M.D., by and through  
their undersigned counsel, and pursuant to the Order Directing Pre-Trial Procedure dated March 28<sup>th</sup>, 2017,  
hereby file their Disclosure of Expert Witnesses as follows:

1. Howard Lieberman, M.D.  
3128 Royal Palm Avenue  
Miami Beach, Florida 33140

TRAUMA/ CRITICAL  
CARE

Dr. Lieberman is expected to testify as to the standard of care, causation and damages. His opinions are based upon the review of relevant medical records and depositions in this case, as well as his own education, training and experience. Dr. Lieberman has not provided a written report. A copy of his Curriculum Vitae is attached.

2. David J. Ciesla, M.D.  
650 Geneva Place  
Tampa, Florida 33606

INTERNAL MEDICINE/  
TRAUMA SURGEON

Dr. Ciesla is expected to testify as to standard of care, causation and damages. His opinions are based upon the review of relevant medical records and depositions in this case, as well as his own education, training and experience. Dr. Ciesla has not provided a written report. A copy of his Curriculum Vitae is attached.

3. Joseph R. Berger, M.D.  
219 Gaskill Street  
Philadelphia, PA 19147

NEUROLOGY

Dr. Berger is expected to testify as to the causation and damages. His opinions are based upon the review of relevant medical records and depositions in this case, as well as his own education, training and experience. Dr. Berger has not provided a written report. A copy of his Curriculum Vitae is attached.

4. Dwight Rouse, M.D.  
127 Arlington Avenue  
Providence, Rhode Island, 02906

OB/GYN

Dr. Rouse is expected to testify to the respect to the issues of standard of care and causation of the obstetrical and gynecology care and treatment relating to the non-party, Fabre defendant Berto Lopez, M.D. His opinions are based upon the review of relevant medical records and depositions in this case, as well as his own education, training and experience. Dr. Rouse has not provided a written report. A copy of his Curriculum Vitae is attached.

4. All expert witnesses listed by Plaintiffs and Co-Defendant.
5. Defendants reserve the right to supplement this expert witness disclosure.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail on this 16<sup>th</sup> day of August, 2017 to: **Adam S. Hecht, Esq.**, Searcy Denney, et al, *Counsel for Plaintiff*, [hechtteam@searcylaw.com](mailto:hechtteam@searcylaw.com), [ahecht@searcylaw.com](mailto:ahecht@searcylaw.com), [nbullard@searcylaw.com](mailto:nbullard@searcylaw.com); **Scott E. Solomon, Esq.**, Falk, Waas, Hernandez, Cortina, Solomon & Bonner, P.A., *Counsel for James Justin Goad, M.D. and Palm Beach General Surgery*, [serviceessolomon@falkwaas.com](mailto:serviceessolomon@falkwaas.com); **John C. Webber, Esq., Bruce Ramsey, Esq.**, Billing, Cochran, Lyles, Mauro & Ramsey, P.A., *Counsel for St. Mary's Medical Center and Robert Borrego, M.D., P.A.*, [marthal@bclmr.com](mailto:marthal@bclmr.com), [bmr@bclmr.com](mailto:bmr@bclmr.com), [jenniferl@bclmr.com](mailto:jenniferl@bclmr.com), [wpb-pleadings@bclmr.com](mailto:wpb-pleadings@bclmr.com); **Rosemary Cooney, Esq.**, Sonneborn Rutter & Cooney, P.A., *Counsel for Raymond Henderson, Sr., M.D. and Raymond Henderson, Sr., M.D., P.A.*, [rcooney@sonnebornrutter.com](mailto:rcooney@sonnebornrutter.com), [rlawson@sonnebornrutter.com](mailto:rlawson@sonnebornrutter.com); **Jonathon P. Lynn, Esq.**, Chimpoulis, Hunter & Lynn, P.A., *Counsel for Raymond Henderson, Sr., MD and Raymond Henderson, Dr., MD, PA*, [jlynn@chl-law.com](mailto:jlynn@chl-law.com), [cmallard@chl-law.com](mailto:cmallard@chl-law.com); **Jeffrey L. Blostein, Esq., Jay Cohen, Esq.**, The Law Office of Jay Cohen, P.A., *Counsel for Wellington Regional Medical Center*, [pleadings@jaycohenlaw.com](mailto:pleadings@jaycohenlaw.com), [jblostein@jaycohenlaw.com](mailto:jblostein@jaycohenlaw.com), [jcohen@jaycohenlaw.com](mailto:jcohen@jaycohenlaw.com), [sbaker@jaycohenlaw.com](mailto:sbaker@jaycohenlaw.com), [kflores@jaycohenlaw.com](mailto:kflores@jaycohenlaw.com); and **James J. Nosich, Esq.**, Nosich & Ganz, P.A., *Counsel for Robert Borrego, M.D. and Palm Beach Trauma Associates*, [jnosich@ngattorneys.com](mailto:jnosich@ngattorneys.com), [sfonseca@ngattorneys.com](mailto:sfonseca@ngattorneys.com), [modrobina@ngattorneys.com](mailto:modrobina@ngattorneys.com), [lgrillo@ngattorneys.com](mailto:lgrillo@ngattorneys.com).

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